

June 20, 2012

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## **VIA ELECTRONIC FILING AND FEDERAL EXPRESS**

Lester A. Heltzer, Executive Secretary Office of the Executive Secretary National Labor Relations Board 1099 14th St. N.W. Washington, D.C. 20570-0001

Re:

800 River Road Operating Company, LLC d/b/a Woodcrest Health Care Center and 1199 SEIU United Healthcare Workers East, New Jersey Region, Docket No. 22-RC-073078

Dear Executive Secretary Heltzer:

Our firm represents the Employer, 800 River Road Operating Company, LLC d/b/a/ Woodcrest Health Care Center ("Employer"), in the above-captioned case. On or about June 4, 2012, the Hearing Officer in this case issued his Report on Objections and set a deadline of June 18, 2012 to file exceptions. This office previously requested an adjournment of that filing date through June 21, 2012. At this time, we now respectfully request an additional extension of our time to file exceptions herein from Thursday, June 21, 2012 to, through and including, Tuesday, June 26, 2012. The reason for the request is that I require the Employer's review and approval of draft exceptions and a supporting brief. I will first provide the draft of these documents to the Employer tomorrow, June 21. In order to afford the Employer an appropriate amount of time to review the submission meaningfully, I request the 3 business day extension referenced above.

The extension that was previously requested and granted was 3 business days. I purposefully requested a relatively short adjournment in order to ensure that neither the Petitioner nor Board would be concerned that the additional time would unduly delay resolution of this case. I proceed on the same premise in asking for just an additional 3 business days at this time.

By copy of this letter, we are serving notice of our request on Regional Director J. Michael Lightner and opposing counsel. William Massey, Esq. is out of the office until July 2. In his absence, I have spoken to his office and asked that it let me know its position on this request, which I will convey upon receipt.

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Accordingly, for the reasons set forth, I respectfully request adjournment of the Employer's time to file exceptions herein until Tuesday, June 26.

Respectfully submitted,

<u>s/Jedd Mendelson</u> . Jedd Mendelson

JM/vl

cc: J. Michael Lightner (via e-mail) Katherine Hansen (via e-mail)

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